
EXHIBIT B

From: Bennett, Natalie A. <natalie.bennett@morganlewis.com>
Sent: Friday, July 22, 2022 12:08 PM
To: Max Ciccarelli
Subject: RE: STMicr Subpoena

We are likely willing to make knowledge GE witnesses available for questioning on appropriate topics, but that is not going to happen until we have had time to determine internally what responsive discovery exists.

Purdue has also subpoenaed GE and I am telling Shore Chan the same thing re extension. You all may want to talk to each other, but I think the soonest we can make anyone available for a deposition is 3-4 weeks. It seems like if both parties can agree to a mutually agreeable extension on the GE discovery that it is in both side's best interest.

Let me know!
Natalie

Natalie A. Bennett

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From: Max Ciccarelli <max@CiccarelliLawFirm.com>
Sent: Friday, July 22, 2022 12:35 PM
To: Bennett, Natalie A. <natalie.bennett@morganlewis.com>
Subject: RE: STMicr Subpoena

[EXTERNAL EMAIL]

Good to see your name. Let me check with the client about an extension. The issue is that we have been totally stonewalled by the Plaintiff. While discovery cutoff is not until November, we need the information for some basic case strategy and other things we need to know before we start taking depositions of the Plaintiff, which will start happening in a few weeks. My guess is that the client is going to be hesitant to extend more than a week or so.

Let me reach out and find out.

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From: Bennett, Natalie A. <natalie.bennett@morganlewis.com>
Sent: Friday, July 22, 2022 10:57 AM
To: Max Ciccarelli <max@CiccarelliLawFirm.com>
Subject: STMicro Subpoena

Hi Max,

I was retained yesterday to respond on behalf of General Electric to the subpoena STMicro served in 6:21-cv-00727-ADA. I was hoping we could work out an extension so that I can get up to speed to look into the requested documents/testimony.

Can you let me know if there are upcoming deadlines with the case schedule and your initial impressions regarding an extension?

Thanks!
Natalie

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